REMARKS

This paper is responsive to a Non-Final Office action dated April 5, 2006. Claims 10-12, 17-26, 30-35, and 38-41 were examined. Applicant previously cancelled claims 1-9, 13-16, and 27-29 to advance prosecution, because the Office indicated that claims 10-12, 17-26, 30-35, and 38-41 were allowable. Since the Office has withdrawn the indication of allowability and the previously cancelled claims were only cancelled to help advance prosecution, all of the previously rejected claims are now added as new claims. Furthermore, amendments are currently made to remove previous amendments made in accordance with the now withdrawn indication of allowable subject matter. In particular, claims 10-12 have been amended to remove limitations of incorporated from their previous parent claim 1 (now restored as new claim 42). The claims 10-12 have also been amended to depend from claim 42, the reincarnation of cancelled claim 1.

Claim Rejections – 35 U.S.C. §102

Claims 10-12, 17-26, 30-35 and 38-41 are rejected under 35 U.S.C. §102(e) as being anticipated by Robins et al., U.S. Patent No. 6,115,744 (hereinafter "Robins"). Applicant respectfully traverses all of the rejections. The rationale for the rejections is vague since the Office has merely reproduced the claims and appended one of three citations to various portions of the claims. Despite the vague citations, it should be clear that Robins fails to disclose or suggest any of the claims.

Overview of Robins

Robins discloses a gateway executor with message handlers to process network messages. If a message is received from a client that has not been associated with a message handler (i.e., a client without an established connection), then the message handler establishes a connection with a service program for the client. See col. 8, lines 9-54, Figure 4, and Figure 5. For a message from a client with an established connection, a message handler retrieves an entry from the context data store, and processes the message with the retrieved information. See col. 8, lines 55-67. The message handler then "translates parameter data as necessary from client application to server-dependent forms and formats it into a service request structure." Col. 8,

lines 63 - 67. The message handler then pulls information from the service request structure, and places it into "a target service program-specific request buffer format." Col. 9, lines 18 - 22. The target service program-specific request buffer is then sent to a target service program over a connection via a procedure call. See col. 9, lines 20 - 22.

Robins also discloses the gateway executor including a reply monitor that monitors the status of pending requests and generates reply messages to client applications. If the reply monitor finds a pending request, the reply monitor uses information from the pending request entry to build a service request structure from the target service program-formatted buffer, and then builds a reply service message from the built service request structure. *See* col. 10, lines 1 – 14. The reply monitor forwards the built reply service message to the appropriate message handler, and the message handler "formats the reply service message according to the relevant gateway executor protocol elements and forwards it over the network connection 420 for transmission to the client processor 110." Col. 10, lines 15 – 24.

Robins discloses translating and building, but does not disclose or suggest validating

Robins never discloses validating a request in accordance with a request message specification, validating a response against a response message specification, or forwarding validated messages across a security barrier.

Claim 42 recites the following:

- validating a request message encoded in a structured
 request language against a predefined request
 message specification therefor;
- transmitting the validated request message across the security barrier;
- validating a response message encoded in a structured response language against a predefined response message specification therefor, the response message corresponding to the validated request; and
- transmitting the validated response message across the security barrier.

Robins discloses receiving a request message from a client, and translating the message into a different format, and then building another request message from the translated message. Robins also discloses building a response message from a request structure. However, Robins fails to disclose or suggest validating as recited in claim 42, and similar recited in claims 17, 20, 22, 24, 25, 30, 32, and 55.

Robins fails to disclose or suggest forwarding validating message across a security barrier

Furthermore, Robins does not disclose or suggest transmitting a built request message across a security barrier as recited in claim 42, 17, 20, 22, 30, and 32. In addition, Robins fails to disclose or suggest forwarding *only* validated messages across a security barrier as recited in claims 24, 25, and 55. Robins discloses making a procedure call to transmit a built message across a connection to a target service. Robins discloses a firewall 132, but request messages are not transmitted across the firewall 132. The firewall 132 resides between the gateway executor 120 and the network 130.

Robins fails to disclose or suggest formatting an access request and supplying the formatted access request to an intermediary

Assuming *arguendo* that a broadest most reasonable interpretation of the claims allows the Office to interpret the data structure formats disclosed in Robins as message specifications, Robins discloses the gateway executor formatting a message in accordance with one of the data structure formats, and then sending the formatted message from the gateway executor to the target service. Robins does not disclose or suggest formatting a message and supplying a formatted message to an intermediary, which validates the formatted message, and forwarding a validated formatted message across a security barrier. The gateway executor does not transmit message to an intermediary, and Robins fails to disclose or suggest an intermediary that validates formatted messages. Hence, Robins fails to disclose or suggest "formatting an access request in accordance with the structured request language; supplying the formatted access request to a first intermediary, the intermediary validating the formatted access request in accordance with the request message specification; and forwarding the validated access request across the security

barrier" as recited in claim 17, and fails to disclose or suggest similar limitations for a response to the access request as in claims 20 and 22.

Robins does not disclose or suggest first and second secure data brokers

Robins fails to disclose or suggest a single secure data broker, and also fails to disclose or suggest first and second secure data brokers on opposing sides of a security barrier that perform message validatings as recited in claim 10. As stated above, Robins does not disclose or suggest validating messages. Even the translation and building disclosed by Robins is performed only by a single gateway executor, which does not reside on opposing sides of a security barrier.

In addition, Robins does not disclose or suggest parsing messages using Data Type Definitions encoding a hierarchy of valid tag-value pairs in accordance with syntax of a valid request (response) message as recited in claims 11 and 12.

Applicant respectfully submits that Robins clearly fails to disclose or suggest any of the claims. Applicant respectfully requests the rejections be withdrawn since none of the art of record discloses or suggests any of the claims.

Conclusion

In summary, claims 10-12, 17-26, 30-35, and 38-59 are in the case. All claims are believed to be allowable over the art of record, and a Notice of Allowance to that effect is respectfully solicited. Nonetheless, if any issues remain that could be more efficiently handled by telephone, the Examiner is requested to call the undersigned at the number listed below.

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